

*Redacted***SEALED**

8-5-14

AO 91 (Rev. 11/11) Criminal Complaint

Filed

Clerk, U. S. District Court  
Western District of Texas

By

Deputy

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

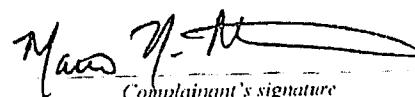
United States of America )  
 v. )  
 ) Case No. 5:14-MJ-805  
 )  
 "Lupio" TNU (3); )  
 Steven Contreras (5) )

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1, 2012 to March 19, 2013 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:*Code Section*Title 21 U.S.C. §§ 846, 841(a)(1) &  
841(b)(1)(B)*Offense Description*Conspiracy to Distribute and Possess with Intent to Distribute 100 grams or  
more of a mixture and substance containing a detectable amount of Heroin, a  
Schedule I Controlled Substance.Penalty: Five (5) to Forty (40) years imprisonment, maximum 5 million fine; 4  
years supervised release; and \$100 Mandatory special assessment fee

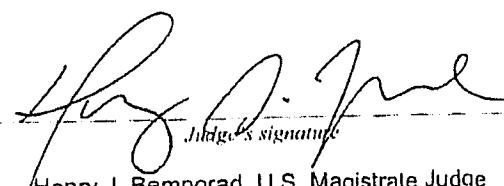
This criminal complaint is based on these facts:

*See attached Affidavit**✓* Continued on the attached sheet.  
Complainant's signature

Mario Martin, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/05/2014  
Judge's signature

Henry J. Bemporad, U.S. Magistrate Judge

Printed name and title

City and state: San Antonio, Texas

## AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Affiant, Mario Martin, Special Agent, United States Federal Bureau of Investigation (FBI), being duly sworn under oath, states as follows: I make this affidavit based upon personal knowledge derived from my participation in this investigation; information I have learned from discussions with other FBI Special Agents, and Task Force Officers; from the review of written reports of investigations, arrests and seizures; from the review of reports of physical and electronic surveillance conducted by the state, federal and local officers; from the review of telephone toll records and pen register data; from the contents of consensual interceptions of communications; and, from the review of reports of debriefings of sources of information and other witnesses.

This affidavit is submitted in support of a criminal complaint, charging:

### 3. LUPIO True Name Unknown (TNU)

### 5. STEVEN CONTRERAS

With Conspiracy to Distribute and Possession with Intent to Distribute Heroin, which offense involved 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance.

The FBI had developed a confidential source (CHS1) who was dealing directly with the Drug Trafficking Organization (DTO):

**January 2012:** The CHS1 saw [redacted] in possession of a kilogram of heroin. Later that month, [redacted] gave CHS1 a sample of heroin. The sample was handed over to the FBI agents [redacted]

**February 2012:** At the direction of the FBI, CHS1, negotiated with [redacted] to purchase 4 ounces of heroin for a price of \$5,600.00. On February 2, 2012, [redacted] directed CHS1 to meet with [redacted] at the Rumors bar. The CHS1 meets [redacted] then they proceed to a house in the [redacted] San Antonio, Bexar County, Texas where CHS1 pays [redacted] \$5,600.00 and [redacted]

"Lupio" TNU hands CHS1 the heroin. The lab results confirmed that the substance was heroin with a net weight of 96.233 grams.

On February 22, 2012, at the direction of the FBI, CHS1 coordinates with for the purchase of two (2) ounces of heroin for a price of \$2,800. directed CHS1 to travel to the Westside of San Antonio then telephoned CHS1 to travel to a specific location in the 200 block of Genova. Upon CHS1's arrival, called out to CHS1 from a house in the CHS1 entered the house and met with

handed CHS1 the heroin and CHS1 handed \$2,800 to and counted the money. The lab results confirmed that the substance was heroin with a net weight of 47.9 grams.

**March 2012** CHS1 met with at a local park and showed him that a pound of heroin that was selling to someone named

**March 2013** On March 16, 2013, one of the distributors was arrested by the San Antonio Police Department and found in possession of 12 ounces of Heroin. A couple of days later, CHS1 observed and **STEVEN CONTRERAS (CONTRERAS)** storing and processing large quantities of heroin at CONTRERAS' residence in the San Antonio, Bexar County, Texas.

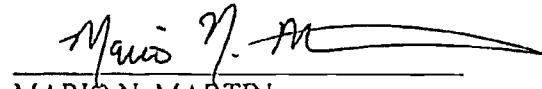
## **CONCLUSION**

Based on the foregoing, I believe that there is probable cause to believe that

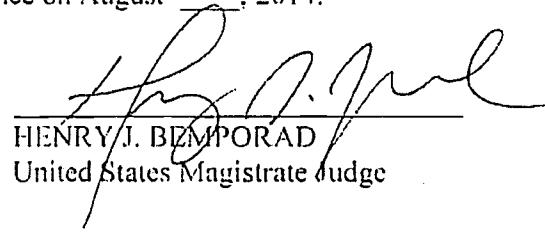
LUPIO TNU, and STEVEN CONTRERAS did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together and with each other to distribute and possess with intent to distribute a controlled substance, which offense involved 100 grams or more of a mixture and substance containing a

detectable amount of Heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(B).

AFFIANT FURTHER SAYETH NOT.

  
MARIO N. MARTIN  
Special Agent, FBI

Sworn to before me and signed in my presence on August 5, 2014.

  
HENRY J. BEMPORAD  
United States Magistrate Judge